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AUG 19 2022

CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Howard Dotson
vs.

Gillette Children's Speciality Healthcare

Case No. 22-cv-2046 MJD/ECW
(To be assigned by Clerk of District
Court)

DEMAND FOR JURY TRIAL
YES ☒ NO ☐

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name	Howard_Dotson (Pro Se)
Street Address	14103 68th Pl Nth
County, City	Hennepin County Maple Grove
State & Zip Code	MN 55311
Telephone Number	763-600-9078

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name Gillette Children's Speciality Healthcare

Street Address **200 University Ave. East**

County, City Ramsey County St Paul

State & Zip Code MN 55101

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Question ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

US Code 4101 Defamation

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

N/A

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached.

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ G Defendant(s) reside in Minnesota ☒ G Facts alleged below primarily occurred in Minnesota

☐ G Other: These defamation offenses caused damage to my personal and professional reputation that extends beyond the State of MN.

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. I, Howard R Dotson, of 14103 68th Place North, Maple Grove, MN 55311 do hereby swear under oath that:

1. On Sunday July 24th acts of slander were committed by Gillette Children's employees (RN and HR personnel) against Howard Dotson. He was performing his official duties as a per diem chaplain for Regions that contracts with Gillette Children's hospital. Howard Dotson was doing his rounds and followed up with a family in the PICU. With his experience and proven cross cultural competency, he offered to share a historic hymn with an African American family. As part of the introduction he wanted to provide an illustration of a sign of progress, so he said. "Originally this Hymn used to be the "Negro National Anthem" but now we call it "Lift Every Voice and Sing." The Gillette Children's RN and HR staff committed defamation and slander when they reported to Howard Dotson's Chaplain Supervisor at Regions, Rob Ruff, that Howard Dotson used the "N Word." With no due diligence or due process, Howard Dotson's supervisor was told that Howard Dotson is no longer welcome on Gillette Children's hospital property.

2. On Wed July 27th a demand letter was sent to key point people at Gillette Children's

Hospital which informed them of the deadline to issue a public retraction and apology for these acts of slander and wrongful termination. Gillette Children's legal team did not meet this deadline.

3. Another attempt via email was sent with terms of relief and this was not answered by Athena Ellias.

4. Another email communicating the deadline of Friday Aug 19th 9 AM was never answered by Athena Ellias.

Therefore, Howard Dotson is suing Gillette Children's Specialty Healthcare for the acts of defamation and Slander under US Code 4101.

Remedy: 1 year of lost wages and punitive of \$1 Million should this proceed to trial. Under penalty of perjury, I hereby declare and affirm that the above stated facts, to the best of my knowledge, are true and correct.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Due to acts of slander committed by Gillete Children's Hospital Employees and my effective wrongful termination, I am seeking one years worth of my salary \$ 56,000 as damages.. In addition, due to this injury to my personal and professional reputation and the defendant's unwillingness to be a faithful conflict resolution partner after 3 failed attempts, I am seeking \$ 1 million in punitive damages should this go to trial.

Date: 8/19/22

Signature of Plaintiff Howard Datsen

Mailing Address 14103 68th Pl Nth Maple Grove MN 55311

Telephone Number 763-600-9078

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.